

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

SOLAN HOLDING, BV, SYNEXXUS
COMPOSITES, et al.,

Plaintiffs,

vs.

GREGORY GLAROS, SYNEXXUS INC., et
al.,

Defendants.

Case No.: 1:22-cv-00786

WRITTEN STIPULATION OF UNCONTESTED FACTS

Per the Court's Order (ECF No. 59), Plaintiffs Solan Holding BV ("Solan"), Synexxus Composites LLC, and Patrick Coughlin, together with Defendants Gregory E. Glaros, Synexxus, Inc., and William Burns, by and through their undersigned counsel, hereby stipulate to the following uncontested facts:

1. Neither Coughlin nor Solan had any involvement with the Stiletto.
2. On August 31, 2021, Synexxus Composites entered a contract with the Republic of India for Synexxus Composites to deliver to India one multi-role carbon fiber vessel (the "India Contract").
3. Glaros was first introduced to Solan in late October 2021.
4. On November 3, 2021, Synexxus Composites, LLC and Solan entered into a Non-Disclosure and Confidentiality Agreement.
5. On November 8, 2021, Solan and Synexxus Composites entered into a convertible promissory note (the "November 2021 Note").
6. Solan drafted the November 2021 Note.

7. On December 20, 2021, Solan and Synexxus Composites entered into a 60-day convertible promissory note (the “December 2021 Note”).

8. Solan drafted the December 2021 Note.

9. On January 13, 2022, Solan and Synexxus Composites agreed to an addendum to the December 2021 Note (the “January 2022 Addendum”).

10. Solan drafted the January 2022 Addendum.

11. Burns started as the President of Synexxus, Inc., on January 17, 2022.

12. Synexxus Composites received from the Republic of India, Navy Certificates of Completion for Stage I and Stage II under the India Contract.

13. India made the Stage I payment to Synexxus Composites in late April 2022.

JOINTLY FILED AND AGREED AS TO FORM AND CONTENT:

Dated: April 19, 2023

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of Court and served via ECF on all counsel of record registered to receive service via the Court's CM/ECF system.

/s/

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